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UNIVERSITY of DENVER

Department of Athletics and Recreation

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 29, 1993

BY HAND

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: PP Docket No. 93-21
Sports Migration Inquiry

Dear Ms. Searcy:

Transmitted on behalf of The University of Denver
an original and nine copies of the its Comments in the

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of Section 26 of the) PP Docket No. 93-21
Cable Television Consumer Protection)
and Competition Act of 1992)
)
Inquiry into Sports Programming)
Migration)
)

COMMENTS OF THE UNIVERSITY OF DENVER

The University of Denver ("University") submits these comments in response to the Commission's Notice of Inquiry ("Notice") in this proceeding. Prime Sports Network ("PSN") provides cable coverage of certain sports events featuring University teams. The University has been unable to obtain broadcast television coverage of these or other University sports events.

Although the Notice states that the Commission intends to focus on professional sports and college football and basketball, it also solicits "data on other sports as appropriate." Notice at ¶¶5, 10. It also seeks information about cable carriage of sports "programming that otherwise would not have been transmitted via video at all," and specifically questions whether the public is "better served by the current mix [of broadcast and cable sports programming] than it was before?" Id. at ¶30.

If not for PSN, television viewers in this area would not have the opportunity to see sports events involving University teams. Broadcast television stations and networks generally have not been interested in televising University sports events, presumably because broadcasters do not anticipate sufficient advertising revenues to support such programming. Even where the coverage of certain sports events was independently produced (for example, the University independently produced the coverage of two gymnastics events) so that broadcasters would incur no production costs in televising those events, broadcasters have not been interested in televising those programs.

In contrast, PSN has carried ten University hockey games, the two gymnastics events referred to above, and a variety of sports events produced by the Colorado Athletic Conference, including games involving the University men's and women's basketball teams and the women's volleyball team. Thus, PSN has provided the only real television exposure for University sports teams.


Because broadcast television stations and networks have not expressed interest in televising the University hockey, basketball and volleyball games and other University sports events carried on PSN, or any of the numerous other sports events featuring University teams, there has been no real "migration" of such events from broadcast television to cable. However, the University and television viewers interested in University sports

events are better off under the current mix of broadcast and cable sports events because at least some events featuring University sports teams, which would not otherwise be available on broadcast television, are available on PSN.

March 29, 1993

Respectfully submitted,

THE UNIVERSITY OF DENVER

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